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IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF YAMHILL

BETH WOOSLEY, GREG WOOSLEY, JEFF  
MCNEAL, KATHLEEN MCNEAL, MEGHAN  
ROGERS-CZARNECKI, STEFAN  
CZARNECKI, and ELIZABETH GEMEROY,

Plaintiffs,

vs.

NEWBERG SCHOOL DISTRICT 29J, an  
Oregon public school district, TREVOR  
DEHART, RENEE POWELL, BRIAN  
SHANNON, and DAVE BROWN, individually  
and in their capacity as members of the board of  
directors of Newberg School District 29J,

Defendants.

Case No. 21CV41198

Honorable Cynthia L. Easterday

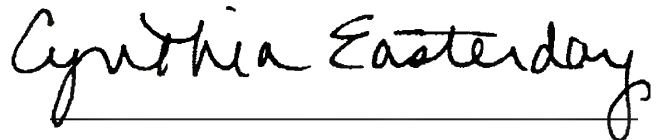
ORDER GRANTING DEFENDANTS'  
MOTION TO STRIKE

The Court heard arguments on Defendants’ DeHart, Powell, Shannon, and Brown (collectively “individual Defendants”) motion to strike paragraphs 18, 30 and 38 and section (C) and (F) of the Prayer for Relief of the Plaintiffs’ First Amended Complaint on March 14, 2022. The Honorable Judge Easterbrook ordered the Plaintiffs and the individual Defendants to provide supplemental briefing on the precise nature of the equitable relief requested by Plaintiffs. Having taken the matter under advisement, including the supplemental briefing of the parties:

1 It is hereby ORDERED and ADJUDGED:

- 2 1. The individual Defendants' motion to strike paragraphs 18, 30 and 38 and section (C) and  
3 (F) of the Prayer for Relief of the Plaintiff's First Amended Complaint is hereby  
4 GRANTED;
- 5 2. Plaintiffs' request for leave to file a Second Amended Complaint to make their equitable  
6 theory of relief more definite and certain is GRANTED; and
- 7 3. Plaintiff is ordered to file any amended pleadings by July 1, 2022.
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11 6/14/2022 2:53:15 PM

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13  
14 **Circuit Court Judge Cynthia L. Easterday**

15 Submitted by:

16 THENELL LAW GROUP, P.C.

17           /s/ Daniel E. Thenell          

18 Daniel E. Thenell, OSB 971655

19 Email: [dan@thenelllawgroup.com](mailto:dan@thenelllawgroup.com)

20 Thenell Law Group, P.C.

12909 SW 68th Pkwy, Suite 290

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Telephone: (503) 372-6450

*Of Attorneys for Defendants DeHart,*

*Powell, Shannon and Brown*

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1 **CERTIFICATE OF READINESS PURSUANT TO UTCR 5.100**

2  
3 I certify that I have complied with UTCR 5.100, and the submission of this **[PROPOSED]**  
4 **ORDER GRANTING DEFENDANTS’ MOTION TO STRIKE** is ready for judicial signature  
because:

- 5  1. Each opposing party affected by this order or judgment has stipulated to the order  
6 or judgment, as shown by each opposing party’s signature on the document being  
7 submitted.
- 8  2. Each opposing party affected by this order or judgment has approved the order or  
9 judgment, as shown by the signature on the document being submitted or by written  
confirmation of approval sent to me.
- 10  3. I have served a copy of this order or judgment on all parties entitled to service and:  
11  (a) No objection has been served on me;  
12  (b) I received objections that I could not resolve with the opposing party  
13 despite reasonable efforts to do so. I have filed a copy of the  
objections I received and indicated which objections remain  
unresolved.
- 14  (c) After conferring about objections Plaintiff agreed to independently file  
15 any remaining objection.
- 16  4. The relief sought is against an opposing party who has been found in default.
- 17  5. An order of default is being requested with this proposed judgment.
- 18  6. Service is not required pursuant to subsection (3) of this rule, or by statute, rule or  
19 otherwise.
- 20  7. This is a proposed judgment that includes an award of punitive damages and  
21 notice has been served on the Director of the Crime Victims’ Assistance Section as  
required by subsection (4) of this rule.

22 DATED: June 13, 2022

23 THENELL LAW GROUP, P.C.

24 By: /s/ Daniel E. Thenell  
25 Daniel E. Thenell, OSB #971655  
26 Attorneys for Defendant

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on June 13, 2022, I served the foregoing **[PROPOSED] ORDER**  
3 **GRANTING DEFENDANTS' MOTION TO STRIKE** on:

4  
5 Judy Danelle Snyder, OSB #732834

6 [judy@jdsnyder.com](mailto:judy@jdsnyder.com)

7 Melissa L. Hopkins, OSB #192226

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19 1050 SW Sixth Ave., Ste. 1600


20 Portland, OR 97204-1116

21 *Of Attorneys for Defendant Newberg School District 29J*

22 **SENT VIA:**

- 23  U.S. Postal Service, ordinary first-class mail
- 24  U.S. Postal Service, certified or registered mail, return receipt requested
- 25  Hand Delivery
- 26  Facsimile
- 27  Electronic Service
- 28  Email
- 29  Other (specify) \_\_\_\_\_

30 THENELL LAW GROUP, P.C.

31 By:   
32 Anne M. Puppo, Legal Assistant